

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
Application by Verizon New England, Inc.,	)	
for Authorization Under Section 271 of the	)	CC Docket No. 00-176
Communications Act To Provide In-Region,	)	
InterLATA Service in the Commonwealth	)	
of Massachusetts	)	

MOTION TO EXCEED PAGE LIMIT

The Massachusetts Department of Telecommunications and Energy ("Department") respectfully requests that the Federal Communications Commission ("Commission") waive the 50 page limit outlined in the Commission's September 28, 1999 Public Notice,<sup>1</sup> and to permit the Department's reply comments in support of the application by Verizon New England, Inc. d/b/a Verizon Massachusetts ("VZ-MA") under Section 271 of the Telecommunications Act of 1996 to exceed 50 pages. In support of this motion, the Department states as follows:

1. Based upon the extensive record developed in the Massachusetts proceeding, D.T.E. 99-271, the Department filed on October 16, 2000 its Evaluation of VZ-MA's compliance with § 271 of the Telecommunications Act of 1996 ("Act"). The Department's Evaluation recommended, without qualification, that the Commission grant VZ-MA's § 271 application.

2. Numerous interested third parties also filed comments to VZ-MA's § 271 application on October 16, 2000, including comments by parties who did not participate in the Massachusetts proceeding. In total, the Department received and reviewed comments from fifteen interested third parties who opposed VZ-MA's § 271 application. In addition, the

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<sup>1</sup> Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, Public Notice, DA 99-194, 1999 WL 766282 (CCB rel. Sept. 28, 1999) ("September 28, 1999 Public Notice").

United States Department of Justice ("DOJ") filed its Evaluation on October 27, 2000.

3. In order to reply properly to the comments and the DOJ Evaluation, and particularly to reply to those comments that appear inconsistent with the findings and recommendations in the Department's Evaluation, the Department requires in excess of 50 pages to advise the Commission fully regarding our investigation and support of VZ-MA's § 271 application. It is our expectation that the Department's thorough response to arguments raised by commenters and the DOJ will assist the Commission in its evaluation of VZ-MA's § 271 application and, accordingly, will facilitate a more expeditious federal review.

WHEREFORE, the Department respectfully requests that the Commission waive the 50 page limit, and to permit the Department to submit a lengthier reply.

Respectfully submitted,

Paul G. Afonso

General Counsel  
Commonwealth of Massachusetts  
Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts

Dated: November 3, 2000